

memorandum

DATE: October 26, 2001

REPLY TO
ATTN OF: (Geiser 6-9280)

SUBJECT: Subject: Next Steps for Long-Term Stewardship

TO: Distribution

As part of my overall assessment of the Environmental Management (EM) program, I am evaluating our approach to addressing our long term stewardship responsibilities. Over the next few months we will be working to clarify the purpose of the long term stewardship program, and the roles and responsibilities for management of long term stewardship within the Department, both at Headquarters and in the Field. This effort will include a review of the approach we are taking to conduct planning at the site level as well as the transfer of responsibility for stewardship activities after EM's cleanup actions are complete.

However, based on my review to date I have made several decisions regarding the management of long term stewardship. First, I am consolidating the programmatic and policy lead for long term stewardship at Headquarters. Stewardship is an important component of the overall cleanup effort, thus policy and direction needs to come from Headquarters. This change will allow us to better focus the efforts of the Idaho National Engineering and Environmental Laboratory on the scientific and technical aspects of long term stewardship. This memorandum supercedes the Memorandum of Understanding between Headquarters, Idaho, and the Grand Junction office.

Second, I want to continue to use an Executive Steering Committee to evaluate and develop policy and to prepare a strategic plan for the Department's long term stewardship efforts. In an effort to improve its efficiency and effectiveness I am reducing the size of the committee to the membership identified in Attachment A. The strategic plan should be prepared using the draft principles (Attachment B) developed from the discussion at the last Executive Steering Committee meeting.

Third, I have asked the Office of Long Term Stewardship to lead a review of the existing and proposed regulatory requirements for post-closure. This will include the identification of those site-specific post closure requirements that are in place and being met as well as impending compliance documents impacting our long term stewardship responsibility. I encourage the Field Office staff to consider those requirements that do, or will apply at their sites after cleanup is complete, and to assist us in developing a comprehensive picture. We need to know where we stand before we enter into new policy regarding post closure enforceable actions.

Finally, we must improve our coordination with national groups representing other governmental entities. After careful review I have decided to release the *National Study on Long Term Stewardship*. This is an important reference for our assessment of the EM program and represents the public's view of issues associated with the management of long term stewardship. The *Study* discusses the important role that Local, State and Tribal Governments have to play in ensuring the long term protection of human health and the environment. Clear communication and proper coordination with national groups representing these governments will help the Department shape and implement its policies. We are currently reviewing how to best work with the various groups who have interest in these issues and to do it in an efficient and expeditious manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Attachments

Long Term Stewardship Executive Steering Committee

In an effort to streamline the existing Long Term Stewardship Executive Steering Committee I have decided to reduce the membership to eight people. I have chosen to use a balance of Headquarters and Field personnel with representation from closure sites and those with continuing missions as well as retaining corporate representation from the Department's headquarters elements. I am requesting participation at the level of Assistant Manager for Environmental Management or higher from the Field and a senior management representative from the Headquarters elements. EM's Office of Long Term Stewardship will continue to work with the Field Long Term Stewardship Working Group to identify and prepare issues for discussion and to draft the Strategic Plan for the Executive Steering Committee's review.

Field Membership - Limited to one representative each

Albuquerque Field Office
Chicago Field Office
Rocky Flats Field Office
Savannah River Field Office

Headquarters Membership - Limited to one representative each

Defense Programs/NNSA
Office of Science
Environment Safety and Health
Environmental Management

Seven Long-term Stewardship Management Principles

1) Long-term Stewardship is a Department-wide responsibility

As a whole, the Department is committed to the protection of human health and the environment in all of its actions. To ensure success, all Departmental elements must consider long-term stewardship as an integral part of the Department's mission.

2) Long-term Stewardship is a component of all aspects of cleanup decision making

It is the responsibility of sites and Headquarters offices to ensure that long-term stewardship is considered in each decision that impacts DOE cleanup. This responsibility extends from the identification of remediation alternatives, remedial design, construction, operation and through all relevant decisions made over the lifetime of the hazards.

3) The Department is a Trustee of natural and cultural resources

Residual hazards should be managed within the larger context of Federal land management, which includes trusteeship for ecologically and culturally important areas. The Department will manage these hazards in accordance with applicable regulatory requirements.

4) Long-term Stewardship should be incorporated into relevant Departmental policies, practices and systems

Long-term stewardship will be most effective when integrated into existing Departmental processes and management systems. As these DOE policies, practices, and systems (such as Life Cycle Asset Management and Environmental Management Systems) are reviewed and/or implemented, a broad range of long-term stewardship activities and needs may be incorporated. This will facilitate the establishment of long-term stewardship as an essential element of all facets of Departmental missions.

5) An inter-generational approach is needed for Long-term Stewardship

Long-term stewardship is an enduring commitment by the Federal Government. Due to the longevity of hazards, the ramifications and costs of current and future decisions and missions will be experienced by generations to come. As these generations' land use practices and local community structures change over time, current assumptions that guide Departmental policy may require reevaluation and modification.

6) Long-term Stewardship policy must provide a consistent framework and acknowledge sites' need for flexibility

Although a consistent framework for long-term stewardship is required for complex-wide management, Headquarters and sites must be responsive to site-specific requirements (local, Tribal, state, regional, and federal). Therefore, Departmental long-term stewardship policy must be sufficiently flexible to enable sites to perform necessary long-term stewardship functions within their individual regulatory frameworks and communities.

7) The involvement of stakeholders and state, local, and Tribal governments is critical to Long-term Stewardship

The Department has the responsibility to consult with these affected parties on long-term stewardship issues. Ongoing interaction and exchange increases public awareness. In turn, heightened public awareness facilitates informed decision-making and increases the likelihood of successful implementation of long-term stewardship.